

April 11, 2024

Hon. Magistrate Parker  
United State District Court, S.D.N.Y.  
500 Pearl Street, Courtroom 17D  
New York, NY 10007

RE: Supplement to Plaintiff's April 11<sup>th</sup> letter

VIA: electronic submission through *Pro-Se* Intake Unit

Your Honor,

I am the *pro-se* Plaintiff in the above-mentioned matter, hereinafter referred to in first person or as "Plaintiff."

Plaintiff submitted a letter earlier today, regarding the limit imposed by the Court, 36 hours prior to the deposition, that the deposition is to only last from 10 am – 12:30 pm (2.5 hours). Plaintiff, in said letter, explained why such potentially violates her rights to discovery and why such is not enough time for the deposition (it is also unclear to Plaintiff how the Court can make a finding as to how much time is sufficient, particularly when the finding is that a mere 2.5 hours will be sufficient).

An additional ground, which Plaintiff neglected to mention in her letter, is that the very nature of ZOOM depositions 'eats up' a great deal of deposition time, whenever exhibits are used. To wit, in the most recent deposition, one exhibit was particularly difficult and neither the deponent nor the court reporter was able to view it. Significant time was spent trying to figure how to make spreadsheet 'work' on the screen, so that the deponent could view it. In Eric Trump's deposition, the sharing and viewing of the exhibits also presented technical challenges which often takes up significant time. Mr. Parscale's deposition is exhibit-heavy and, as such, it is particularly ill-suited for such an extremely small timeframe.

Plaintiff respectfully requests that the deposition time of three hours be permitted and that, *if* additional time is needed, Plaintiff maintains the right to seek additional deposition time of this witness, to take place on a separate date.

Respectfully and humbly submitted,  
s/ Arlene Delgado  
Plaintiff, *pro-se*